

The Trust Fund is for the Czech law a completely new institution, therefore its deeper legal examination and interpretation of its individual provisions is just at the beginning. It is generally regulated by the Act no. 89/2012 Sb., the Civil Code, as amended. The essence of the Trust Fund lies in the fact that the Settlor separates a specified part of his property and entrusts it to some purpose. This creates a separated property, to which has the original owner (the Settlor) no ownership rights. Management of this separated property performs the Trustee. However, he has no ownership of this property. Property in the Trust Fund does not belong to anyone, but the Trustee can dispose of it.

The aim of this thesis is to comprehensively summarize and analyze the taxation of the Trust Fund according to the regulation applicable in 2014 and also after its revision in January 2015. The thesis identifies the problems and uncertainties in taxation of Trust Fund. It explains how these problems were solved by the revision of the Tax Law and in case of persisting uncertainties proposes solutions *de lege ferenda*.

The thesis is divided into two main parts. The first part deals with the institution of Trust Fund. There is explained its essence, function and obligatory requirements. The second, main part of this thesis focuses in detail on the taxation of the Trust Fund. This part is divided into the following chapters: the general taxation issues of the Trust Fund (tax subjectivity and obligations of the Trustee, the Trust Fund as a Public Benefit Taxpayer), the creation of the Trust Fund (the separation of property, the tax deductibility of costs and the depreciation of assets, the separation of immovable property), its lifetime (taxation of profits, Value Added Tax), the payout of the Trust Fund, remuneration of the Trustee, taxation of foreign Trust Fund, avoidance of double taxation (regulation in the OECD Model Tax Convention) and finally the termination of the Trust Fund.